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Attorneys for Defendant,
BMW Financial Services NA LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SEUNGTAE KIM, an Individual, Plaintiff,
vs.
BMW FINANCIAL SERVICES NA, LLC., a business entity; EQUIFAX INFORMATION SERVICES LLC, a business entity; EXPERIAN INFORMATION SOLUTIONS, INC., a Corporation; TRANSUNION, LLC., a business entity, and DOES 1-10, Inclusive,) CASE NO. 2:14-cv-01752-BRO SH
Assigned to Hon. Beverly Reid O'Connell
DECLARATION OF REBECCA A. CALEY RE DEFENDANT'S EXHIBIT LIST
TRIAL DATE: April 21, 2015
DATE: March 23, 2015
TIME: 3:00 p.m.

I, REBECCA A. CALEY, declare:

1. I am an attorney duly licensed to practice law before this Court and all the courts in the State of California and this United States District Court and am the attorney of record for defendant BMW Financial Services NA, LLC (“BMW FS”) in the above entitled matter. I am personally familiar with each of

the facts as stated herein and if called as a witness, I could and would competently testify thereto.

2. The deadline to file the Joint Exhibit List and Joint Witness List was March 9, 2015. The Joint Witness List was prepared and modified by respective counsel for BMW FS and plaintiff Seungtae Kim (“Plaintiff”) and filed by Plaintiff’s counsel on March 9, 2015.

3. Concerning the Joint Exhibit List, my office received the Joint Exhibit List from Plaintiff's counsel on March 6, 2015, which included Plaintiff's Exhibits 1-48. Since my office was unable to reconcile a total of 15 documents designated as Plaintiff's exhibits, my office requested Defendant to either provide copies of the documents or Bate stamp numbers on March 9, 2015. Meanwhile, my office received two additional revised Joint Exhibits Lists from Plaintiff which included 24 additional exhibits and another seven additional exhibits in the afternoon.

4. While my office was attempting to finalize Defendant's list of exhibits to the Joint Exhibit List and reconcile Plaintiff's exhibits to determine if objections were required, I received an email transmission from Plaintiff's counsel's office on March 9, 2015, at 3:56 pm, that they were filing a separate Plaintiff's Exhibit List. Therefore, since the Joint Exhibit List was no longer possible, Defendant filed its separate exhibit list as well.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9 day of March, 2015, at Brea, California.

Rebecca A. Caley
REBECCA A. CALEY
Declarant